

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

See attached

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

DANIEL JAMES

DISTRICT COURT NUMBER

FILED CR 19 043

DEFENDANT

YGR

IS NOT IN CUSTODY

has not been arrested, pending outcome this proceeding.
 If defendant detained give date any prior summons was served on above charges

- 2) ☐ Is a Fugitive
 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☒ On this charge
 5) ☐ On another conviction } ☐ Federal ☐ State
 6) ☐ Awaiting trial on other charges
 If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
 been filed? ☐ No

If "Yes"
 give date
 filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

ATF

- ☐ person is awaiting trial in another Federal or State Court, give name of court

- ☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

- ☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

- ☒ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

- ☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

4-19-70012 MAG

Name and Office of Person

Furnishing Information on this form David Anderson

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

Shiao Lee & Frank Riebli

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**

☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments:

PENALTY SHEET – DANIEL JAMES

Count One: 18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States
Maximum Penalties: 5 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder
Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

Count Three: 18 U.S.C. § 922(a)(1)(A) -- Unlawfully engaging in the business of dealing in firearms without a license
Maximum Penalties: 5 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

Count Nine: 18 U.S.C. § 922(o) – Possession of a Machine Gun
Maximum Penalties: 10 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

Count Ten: 18 U.S.C. § 922(k) – Possession of a Firearm with an Obliterated Serial Number
Maximum Penalties: 5 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

Counts Fifteen, Eighteen: 21 U.S.C. § 841(a)(1) and (b)(1)(B) – Distribution and Possession with Intent to Distribute 28 grams or more of Cocaine Base
Maximum Penalties: 5-40 years imprisonment; 4 years –lifetime of supervised release, \$5 million criminal fine; \$100 special assessment; forfeiture, denial of federal benefits.

Counts Sixteen, Nineteen, Twenty, Twenty-One: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine or Cocaine Base
Maximum Penalties: 20 years imprisonment, 3 years-lifetime of supervised release, \$1 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**21 U.S.C. § 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) –
Conspiracy to Distribute and Possess with Intent to
Distribute Cocaine Base and Cocaine;
18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

▶ GEORGE MOORE JR.

DISTRICT COURT NUMBER

CR 19 043

YGR

DEFENDANT**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

ATF

☐ person is awaiting trial in another Federal or State Court,
give name of court☐ this person/proceeding is transferred from another district
per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of
charges previously dismissed
which were dismissed on motion
of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☒ this prosecution relates to a
pending case involving this same
defendantMAGISTRATE
CASE NO.☒ prior proceedings or appearance(s)
before U.S. Magistrate regarding this
defendant were recorded under

4-19-70058 MAG

IS NOT IN CUSTODYHas not been arrested, pending outcome this proceeding.
1) ☐ If not detained give date any prior
summons was served on above charges ▶2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
been filed? ☐ NoIf "Yes"
give date
filedDATE OF
ARREST ▶

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY ▶

Month/Day/Year

Name and Office of Person

Furnishing Information on this form David Anderson

☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.
Attorney (if assigned)

Shiao Lee & Frank Riebli

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or
warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments:

PENALTY SHEET – GEORGE MOORE JR.

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

Count Fourteen: 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm

Maximum Penalties: 10 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT☐ SUPERSEDING**OFFENSE CHARGED**

21 U.S.C. § 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) - Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base and Cocaine;
 21 U.S.C. § 841(a)(1) and (b)(1)(C) - Distribution and Possession with Intent to Distribute Cocaine Base

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

TERRY WALKER SR.

DISTRICT COURT NUMBER

CR 19 043 YGR

FILED

DEFENDANT**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

ATF

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☒ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

4-19-70013 MAG

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

If not detained give date any prior

summons was served on above charges

2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

Name and Office of Person

Furnishing Information on this form David Anderson

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Shiao Lee & Frank Riebli

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

Date/Time: _____

Before Judge: _____

Comments: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

PENALTY SHEET – TERRY WALKER SR.

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

Count Twenty-Two: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine Base

Maximum Penalties: 20 years imprisonment, 3 years-lifetime of supervised release, \$1 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**21 U.S.C. § 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -
Conspiracy to Distribute and Possess with Intent to
Distribute Cocaine Base and Cocaine

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

DALE DAVIS

DISTRICT COURT NUMBER

CR 19 043 YGR

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

ATF

- ☒
- person is awaiting trial in another Federal or State Court
-
- give name of court

Alameda County Superior Court

- ☐
- this person/proceeding is transferred from another district
-
- per (circle one) FRCrP 20, 21, or 40. Show District

- ☐
- this is a reprosecution of
-
- charges previously dismissed
-
- which were dismissed on motion
-
- of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.

- ☐
- this prosecution relates to a
-
- pending case involving this same
-
- defendant

MAGISTRATE
CASE NO.

- ☐
- prior proceedings or appearance(s)
-
- before U.S. Magistrate regarding this
-
- defendant were recorded under

Name and Office of Person
Furnishing Information on this form David Anderson☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.
Attorney (if assigned) Shiao Lee & Frank Riebli**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- ☒
- If not detained give date any prior
-
- summons was served on above charges

- ☐
- Is on Bail or Release from (show District)

IS IN CUSTODY

- ☐
- On this charge
-
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
-
- ☐
- Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
been filed? ☐ NoIf "Yes"
give date
filedDATE OF ☐
ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED ☐
TO U.S. CUSTODY Month/Day/Year☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**

- ☐
- SUMMONS
- ☐
- NO PROCESS*
- ☒
- WARRANT

Bail Amount: No bail

If Summons, complete following:

- ☐
- Arraignment
- ☐
- Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or
warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

PENALTY SHEET – DALE DAVIS

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

21 U.S.C. § 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) – Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base and Cocaine;
 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine Base;
 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm;
 18 U.S.C. § 922(o) – Possession of a Machine Gun

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

PAUL RIVERA

DISTRICT COURT NUMBER

043

FILED

DEFENDANT

YGR

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

ATF

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☒ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

4-19-70014 MAG

Name and Office of Person
Furnishing Information on this form David Anderson☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.
Attorney (if assigned) Shiao Lee & Frank Riebli**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

☐ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☒ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

PENALTY SHEET – PAUL RIVERA

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

Count Eleven: 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm

Maximum Penalties: 10 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

Count Thirteen: 18 U.S.C. § 922(o) – Possession of a Machine Gun

Maximum Penalties: 10 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

Count Twenty: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine Base

Maximum Penalties: 20 years imprisonment, 3 years-lifetime of supervised release, \$1 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

21 U.S.C. § 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) –
Conspiracy to Distribute and Possess with Intent to
Distribute Cocaine Base and Cocaine;
18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm;
18 U.S.C. § 922(o) – Possession of a Machine Gun☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

DARRYL WASHINGTON

DISTRICT COURT NUMBER

CR 19 043

DEFENDANT

YGR

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

ATF

☐ person is awaiting trial in another Federal or State Court,
give name of court☐ this person/proceeding is transferred from another district
per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of
charges previously dismissed
which were dismissed on motion
of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☒ this prosecution relates to a
pending case involving this same
defendantMAGISTRATE
CASE NO.☒ prior proceedings or appearance(s)
before U.S. Magistrate regarding this
defendant were recorded under

4-19-70017

Name and Office of Person

Furnishing Information on this form David Anderson

☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.
Attorney (if assigned)

Shiao Lee & Frank Riebli

IS NOT IN CUSTODY

has not been arrested, pending outcome this proceeding.

1) ☐ If not detained give date any prior
summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☒ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
been filed? ☐ NoIf "Yes"
give date
filedDATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or
warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments:

PENALTY SHEET – DARRYL WASHINGTON

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

Count Seven: 18 U.S.C. § 922(o) – Possession of a Machine Gun

Maximum Penalties: 10 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

Count Eight, Twelve: 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm

Maximum Penalties: 10 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

21 U.S.C. § 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base and Cocaine

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

CAMERON MOORE-WILLIAMS

DISTRICT COURT NUMBER

FILED CR 19 043

JAN 24 2019

DEFENDANT**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

ATF

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☒ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form David Anderson

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Shiao Lee & Frank Riebli

IS NOT IN CUSTODY
 SUSAN Y. SOONG, CLERK, U.S. DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA
 Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Date/Time:

Before Judge:

Comments:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

PENALTY SHEET – CAMERON MOORE-WILLIAMS

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 28 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 5-40 years imprisonment; 4 years –lifetime of supervised release, \$5 million criminal fine; \$100 special assessment; forfeiture, denial of federal benefits.

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**21 U.S.C. § 846, 841(a)(1) and (b)(1)(B) – Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base and Cocaine;
21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine Base☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

DEANTAE KENNEDY-PALMER

DISTRICT COURT NUMBER

FILED CR 19 043

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

ATF

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☒ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

4-19-70021 MAG

Name and Office of Person

Furnishing Information on this form David Anderson

☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.
Attorney (if assigned)

Shiao Lee & Frank Riebli

DEFENDANT**IS NOT IN CUSTODY**has not been arrested, pending outcome this proceeding.
If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET – DEANTAE KENNEDY PALMER

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 28 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 5-40 years imprisonment; 4 years –lifetime of supervised release, \$5 million criminal fine; \$100 special assessment; forfeiture, denial of federal benefits.

Count Seventeen: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine Base

Maximum Penalties: 20 years imprisonment, 3 years-lifetime of supervised release, \$1 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

18 U.S.C. § 371 - Conspiracy to Commit Offenses Against the United States;

18 U.S.C. § 922(a)(1)(A) - ~~Dealing Firearms Without a License~~☐ Petty☐ Minor☐ Misdemeanor☒ Felony

PENALTY: See attached

FILED

JAN 24 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

▶ DARRELL MURPHY JR.

DISTRICT COURT NUMBER

CR 19 043**YGR****DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges ▶2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST ▶

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶

Month/Day/Year

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

ATF

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☒ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form David Anderson

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Shiao Lee & Frank Riebli

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Date/Time:

Before Judge:

Comments:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

PENALTY SHEET – DARRELL MURPHY JR.

Count One: 18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States
Maximum Penalties: 5 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

Count Six: 18 U.S.C. § 922(a)(1)(A) -- Unlawfully engaging in the business of dealing in
firearms without a license
Maximum Penalties: 5 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT☐ SUPERSEDING**OFFENSE CHARGED**

18 U.S.C. § 371 - Conspiracy to Commit Offenses Against the United States;

18 U.S.C. § 922(a)(1)(A) - Dealing Firearms Without a License

21 U.S.C. § 846, 841(a)(1) and (b)(1)(B) - Conspiracy to Distribute and Possess with Intent to Distribute Cocaine and Cocaine Base;

21 U.S.C. § 841(a)(1) and (b)(1)(B) - Distribution and

☐ Petty☐ Minor☐ Misdemeanor☒ Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

STERLING WALKER

DISTRICT COURT NUMBER

CR 19 043

DEFENDANT

YGR

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

ATF

☐ person is awaiting trial in another Federal or State Court give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☒ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

4-19-70018

Name and Office of Person

Furnishing Information on this form David Anderson

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) Shiao Lee & Frank Riebli

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☐ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☒ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

Date/Time: _____

Before Judge: _____

Comments: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

PENALTY SHEET – STERLING WALKER

Count One: 18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States
Maximum Penalties: 5 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 28 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 5-40 years imprisonment; 4 years –lifetime of supervised release, \$5 million criminal fine; \$100 special assessment; forfeiture, denial of federal benefits.

Count Five: 18 U.S.C. § 922(a)(1)(A) -- Unlawfully engaging in the business of dealing in firearms without a license

Maximum Penalties: 5 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

Count Twenty-Three: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 28 grams or more of cocaine base

Maximum Penalties: 5-40 years imprisonment; 4 years –lifetime of supervised release, \$5 million criminal fine; \$100 special assessment; forfeiture, denial of federal benefits.

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

18 U.S.C. § 371 - Conspiracy to Commit Offenses Against the United States;

18 U.S.C. § 922(a)(1)(A) - Dealing Firearms Without a License

☐ Petty☐ Minor☐ Misdemeanor☒ Felony

PENALTY: See attached

FILED

JAN 24 2019

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

DESHAWN LEMONS-WOODARD

DISTRICT COURT NUMBER

CR 19 043 YGR

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

ATF

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☒ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form David Anderson

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Shiao Lee & Frank Riebli

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Date/Time:

Before Judge:

Comments:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

PENALTY SHEET – DESHAWN LEMONS-WOODARD

Count One: 18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States
Maximum Penalties: 5 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

Count Four: 18 U.S.C. § 922(a)(1)(A) -- Unlawfully engaging in the business of dealing in
firearms without a license
Maximum Penalties: 5 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**18 U.S.C. § 922(g)(1) - Felon in Possession of a Firearm;
18 U.S.C. § 922(o) - Possession of a Machine Gun☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

▶ VERNELL THROWER

DISTRICT COURT NUMBER

FILED CR 19 043

JAN 24 2019

DEFENDANT**IS NOT IN CUSTODY**Has not been arrested, pending outcome this proceeding.
☒ If not detained give date any prior summons was served on above charges ▶2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST ▶

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶

Month/Day/Year

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

ATF

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☒ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form David Anderson

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Shiao Lee & Frank Riebli

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Date/Time:

Before Judge:

Comments:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

PENALTY SHEET – VERNELL THROWER

Count Seven: 18 U.S.C. § 922(o) – Possession of a Machine Gun

Maximum Penalties: 10 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

Count Eight: 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm

Maximum Penalties: 10 years imprisonment; 3 years of supervised release;
\$250,000 fine; \$100 special assessment; forfeiture.

CR 19

043

YGR

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

FILED

JAN 24 2019

sm

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.

DANIEL JAMES, GEORGE MOORE, JR.,
TERRY WALKER SR., DALE DAVIS,
PAUL RIVERA, DARRYL WASHINGTON,
CAMERON MOORE-WILLIAMS,
DEANTAE KENNEDY-PALMER,
DARRELL MURPHY JR., STERLING
WALKER, DESHAWN LEMONS-
WOODARD, and VERNELL THROWER.

DEFENDANT(S).

INDICTMENT

VIOLATIONS:

- 18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States;
18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License;
18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm;
18 U.S.C. § 922(o) – Possession of a Machine Gun;
18 U.S.C. § 922(k) – Possession of a Firearm With an Obliterated Serial Number;
21 U.S.C. § 846 – Conspiracy to Distribute and Possess with Intent to Distribute Cocaine and Cocaine Base;
21 U.S.C. § 841(a) – Distribution and Possession with Intent to Distribute Cocaine and Cocaine Base; and
18 U.S.C. § 924(d) and 21 U.S.C. § 853(a) – Forfeiture Allegations

A true bill.

[Signature]

Foreman

Filed in open court this 24th day of

January, 2019
[Signature]

Clerk

Bail, \$

[Signature]

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

3 **FILED**

4 JAN 24 2019

5 SUSAN Y. SOONG *en*
6 CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 DANIEL JAMES,
15 GEORGE MOORE, JR.,
16 TERRY WALKER SR.,
17 DALE DAVIS,
18 PAUL RIVERA,
19 DARRYL WASHINGTON,
20 CAMERON MOORE-WILLIAMS,
21 DEANTAE KENNEDY-PALMER,
22 DARRELL MURPHY JR.,
23 STERLING WALKER,
24 DESHAWN LEMONS-WOODARD, and
25 VERNELL THROWER,

26 Defendants.

CR No: 19 043 YGR

VIOLATIONS:

18 U.S.C. § 371 – Conspiracy to Commit Offenses
Against the United States;
18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without
a License;
18 U.S.C. § 922(g)(1) – Felon in Possession of a
Firearm;
18 U.S.C. § 922(o) – Possession of a Machine Gun;
18 U.S.C. § 922(k) – Possession of a Firearm With an
Obliterated Serial Number;
21 U.S.C. § 846 – Conspiracy to Distribute and
Possess with Intent to Distribute Cocaine and Cocaine
Base;
21 U.S.C. § 841(a) – Distribution and Possession with
Intent to Distribute Cocaine and Cocaine Base; and
18 U.S.C. § 924(d), 21 U.S.C. § 853(a), and 28
U.S.C. § 2461(c) – Forfeiture Allegations

OAKLAND VENUE

23 INDICTMENT

24 The Grand Jury charges:

25 COUNT ONE: (18 U.S.C. § 371 – Conspiracy to Commit an Offense Against the United States)

26 1. Beginning on a date unknown to the Grand Jury but since at least June 6, 2017, and
27 continuing up through and including January 10, 2019, in the Northern District of California, the
28 defendants,

INDICTMENT

Document No.
10
District Court
Criminal Case Processing

DANIEL JAMES,
STERLING WALKER,
DARRELL MURPHY JR. and
DESHAWN LEMONS-WOODARD,

knowingly and willfully conspired and agreed with each other and with others, known and unknown to the Grand Jury, to commit offenses against the United States, namely, to willfully engage in the business of dealing in firearms without a license in violation of Title 18, United States Code, Section 922(a)(1)(A).

2. The object of this conspiracy was to sell firearms to individuals. The means and methods by which the defendants and other members and associates of the conspiracy participated in the conspiracy included, but were not limited to, the following: DANIEL JAMES controlled the firearm sales that took place on Makin Road in Oakland, California; DANIEL JAMES and his co-conspirators collected firearms from other persons; and DANIEL JAMES either sold the firearms he and his co-conspirators collected, or he facilitated, directed, or allowed his co-conspirators working on Makin Road to sell the firearms.

OVERT ACTS

3. In furtherance of the conspiracy and to effectuate the objects of the conspiracy, the co-conspirators sold the following firearms in the Northern District of California, on or about the dates listed below, and each of these sales was an overt act in furtherance of the conspiracy:

Date	Firearm Sold	Seller
6/6/17	TKS Engineering AR15HD .223 cal. rifle, serial no. 0910010	JAMES, LEMONS- WOODARD
6/13/17	Glock 23 40 cal. pistol with obliterated serial number	LEMONS- WOODARD
7/18/17	Glock 19 9mm pistol, serial no. TC928	LEMONS- WOODARD
7/18/17	Beretta 84FS Cheetah .380 cal. pistol, serial no. H07025Y	LEMONS- WOODARD
9/13/17	Smith & Wesson SD .40 cal. pistol, serial no. HFJ0152	JAMES
9/18/17	Springfield Armory XD .40 caliber pistol, serial no. US4275	JAMES
10/11/17	AR-15 style pistol, no manufacturer marks or serial number	JAMES

1	10/24/17	Beretta 96 .40 cal. pistol, serial no. BER080602	JAMES
2	10/24/17	AR-15 style pistol, no manufacturer marks or serial number	JAMES
3	11/21/17	Fully automatic Glock 22 40 cal. pistol, serial no. PZL229	JAMES
4	11/21/17	AR-15 style pistol, no manufacturer marks or serial number	JAMES, STERLING
5	1/31/18	Springfield Armory XD .45 caliber pistol, serial no. XD639243	JAMES
6	3/8/18	Springfield Armory XD .40 cal. pistol, serial no. XD565385	MURPHY
7	6/5/18	Springfield Armory XD .45 cal. pistol, serial no. XD667617	JAMES
8	6/5/18	AR-15 style pistol, no manufacturer marks or serial number	JAMES, STERLING
9	6/18/18	Kahr Arms P40 .40 cal. pistol, with an obliterated serial number	MURPHY
10	6/18/18	Smith & Wesson 9mm pistol, serial no. FWS8802	JAMES
11	7/12/18	Heckler & Koch USP40 .40 cal. pistol, serial no. 22-27117;	JAMES
12	7/12/18	Beretta 92FS 9mm pistol, serial no. E38985Z	JAMES
13	7/12/18	Smith & Wesson SD40 VE .40 cal. pistol, serial no. HFW2363	JAMES
14	7/12/18	Taurus PT99AF 9mm pistol, serial no. TYK51102	JAMES
15	7/31/18	Anderson Mfg AM-15 5.56mm cal. pistol, obliterated serial no.	JAMES
16	7/31/18	Anderson Mfg AM-15 5.56mm cal. pistol, obliterated serial no.	JAMES
17	8/23/18	Springfield Armory XD40 sub-compact .40 cal. pistol, serial no. US450601	MURPHY
18	8/23/18	Springfield Armory XD40 .40 cal. pistol, serial no. US387906	MURPHY
19	8/23/18	Smith & Wesson M&P .38 cal. pistol, serial no. 9076	MURPHY
20	8/23/18	Unknown mfr, serial no. unknown	MURPHY
21	10/9/18	Glock 30 .45 cal. pistol, serial no. CMT960US	JAMES
22	10/9/18	Glock-type .40 cal. sub-compact pistol, equipped with Glock 27 slide assembly, serial no. FFF989	JAMES
23	10/9/18	Bryco Arms Jennings Nine 9mm pistol, serial no. 1563705	JAMES
24	11/25/18	Unknown manufacturer, AK-Type short barreled rifle	JAMES
25	11/25/18	Kimber 1911 Ultra Carry II .45 cal. pistol, serial no. KU234373	JAMES

Additional overt acts, among others, were committed in the Northern District of California:

a) On or about June 6, 2017, DESHAWN LEMONS-WOODARD arranged the sale of a rifle and ammunition for DANIEL JAMES. DANIEL JAMES then sold the rifle and ammunition. DESHAWN LEMONS-WOODARD sold additional firearms in furtherance of the conspiracy on or about June 13 and July 18, 2017;

1 b) On or about July 24, 2017, LEMONS-WOODARD sent a text message to an
2 individual photographs containing multiple firearms for sale;

3 c) On or about October 31, 2017, LEMONS-WOODARD sent a text message to an
4 individual stating he could sell two firearms for \$1,000;

5 d) On or about October 31, 2017, LEMONS-WOODWARD sent a text message
6 containing two photos of the firearms for sale to another individual;

7 e) On or about November 21, 2017, STERLING WALKER delivered to DANIEL
8 JAMES on Makin Road an AR-15 style pistol that DANIEL JAMES then sold, along with a fully
9 automatic .40 caliber Glock 22 pistol, to another person;

10 f) On or about March 8, 2018, DANIEL JAMES told another person to speak to his
11 “nef” on Makin Road in order to purchase a firearm. The person then approached PAUL RIVERA and
12 DARRELL MURPHY JR. on Makin Road, and DARRELL MURPHY JR. sold that person a firearm;

13 g) On or about June 5, 2018, DANIEL JAMES arranged to sell multiple firearms to
14 another person, including an AR-15 style pistol. STERLING WALKER brought that firearm to Makin
15 Road and sold it to another person. During the same transaction, DANIEL JAMES sold the person a .45
16 caliber pistol;

17 h) On or about August 23, 2018, DARRELL MURPHY JR. facilitated the sale of
18 four firearms to another person. DANIEL JAMES approved the transaction over the telephone with the
19 other person and said it was safe to purchase guns through DARRELL MURPHY JR.;

20 i) On November 15, 2018, DARRELL MURPHY JR. told DANIEL JAMES over
21 the telephone that he knew someone that had a “Tec” firearm for sale and asked DANIEL JAMES how
22 much it was worth. DANIEL JAMES replied “five, six hundred”;

23 j) On November 26, 2018, DANIEL JAMES told STERLING WALKER over the
24 telephone to let him know if he came across any firearms.

25 All in violation of Title 18, United States Code, Section 371.

26 //

27 //

28 //

1 COUNT TWO: (21 U.S.C. § 846 – Conspiracy to Possess with Intent to Distribute and to
 2 Distribute Cocaine and Cocaine Base)

3 4. Beginning on a date unknown to the Grand Jury but since at least October 11, 2017, and
 4 continuing up through and including January 10, 2019, in the Northern District of California, the
 5 defendants,

6 DANIEL JAMES,
 7 GEORGE MOORE JR.,
 8 TERRY WALKER SR.,
 9 DALE DAVIS,
 10 PAUL RIVERA,
 11 DARRYL WASHINGTON,
 12 CAMERON MOORE-WILLIAMS,
 13 STERLING WALKER and
 14 DEANTAE KENNEDY-PALMER,

11 and others known and unknown to the Grand Jury, knowingly and intentionally conspired to
 12 manufacture, distribute, and possess with intent to distribute a mixture and substance containing cocaine
 13 base, and conspired to distribute and possess with intent to distribute a mixture and substance containing
 14 a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation
 15 of Title 21, United States Code, Sections 846 and 841(a)(1).

16 Quantity of Cocaine and Cocaine Base Involved in the Conspiracy

17 5. With respect to DANIEL JAMES, GEORGE MOORE JR., TERRY WALKER SR.,
 18 DALE DAVIS, PAUL RIVERA, and DARRYL WASHINGTON, their conduct as members of the
 19 conspiracy charged in Count Two, which includes the reasonably foreseeable conduct of other members
 20 of the conspiracy charged in Count Two, involved 280 grams or more of a mixture and substance
 21 containing cocaine base, in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A), and 500 grams or
 22 more of a mixture and substance containing a detectable amount of cocaine, its salts, optical and
 23 geometric isomers, and salts of its isomers, in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B).

24 6. With respect to CAMERON MOORE-WILLIAMS, STERLING WALKER, and
 25 DEANTAE KENNEDY-PALMER, their conduct as members of the conspiracy charged in Count Two,
 26 which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count
 27 Two, involved 28 grams or more of a mixture and substance containing cocaine base, in violation of 21
 28

1 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B), and 500 grams or more of a mixture and substance containing a
2 detectable amount of cocaine, its sales, optical and geometric isomers, and salts of its isomers, in
3 violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B).

4
5 COUNT THREE: (18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License)

6 7. Beginning on or about June 6, 2017 and continuing through January 10, 2019, in the
7 Northern District of California, the defendant,
8 DANIEL JAMES,
9 not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
10 willfully engaged in the business of dealing in firearms, in violation of Title 18, United States Code,
11 Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

12
13 COUNT FOUR: (18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License)

14 8. Beginning on or about June 6, 2017 and continuing through January 10, 2019, in the
15 Northern District of California, the defendant,
16 DESHAWN LEMONS-WOODARD,
17 not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
18 willfully engaged in the business of dealing in firearms, in violation of Title 18, United States Code,
19 Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

20
21 COUNT FIVE: (18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License)

22 9. Beginning on or about November 21, 2017 and continuing through January 10, 2019, in
23 the Northern District of California, the defendant,
24 STERLING WALKER,
25 not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
26 willfully engaged in the business of dealing in firearms, in violation of Title 18, United States Code,
27 Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

1 COUNT SIX: (18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License)

2 10. Beginning on or about March 3, 2018 and continuing through January 10, 2019, in the
3 Northern District of California, the defendant,

4 DARRELL MURPHY JR.,

5 not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
6 willfully engaged in the business of dealing in firearms, in violation of Title 18, United States Code,
7 Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

8
9 COUNT SEVEN: (18 U.S.C. § 922(o) – Unlawful Possession and Transfer of a Machine Gun)

10 11. On or about November 2, 2017, in the Northern District of California, the defendants,

11 DARRYL WASHINGTON and
12 VERNELL THROWER,

13 unlawfully possessed and transferred a machinegun (any weapon which shoots and is designed to shoot
14 automatically more than one shot, without manual reloading, by a single function of the trigger),
15 specifically, a Glock 23 .40 caliber pistol, serial number BAEA916, in violation of Title 18, United
16 States Code, Section 922(o).

17
18 COUNT EIGHT: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)

19 12. On or about November 2, 2017, in the Northern District of California, the defendants,

20 DARRYL WASHINGTON and
21 VERNELL THROWER,

22 having previously been convicted of a crime punishable by a term of imprisonment exceeding one year,
23 unlawfully and knowingly possessed a firearm, specifically, a Glock 23 .40 caliber pistol, serial number
24 BAEA916, in and affecting interstate commerce, in violation of Title 18, United States Code, Section
25 922(g)(1).

26
27 COUNT NINE: (18 U.S.C. § 922(o) – Unlawful Possession and Transfer of a Machine Gun)

28 13. On or about November 21, 2017, in the Northern District of California, the defendant,

DANIEL JAMES,

unlawfully possessed and transferred a machinegun (any weapon which shoots and is designed to shoot automatically more than one shot, without manual reloading, by a single function of the trigger), specifically, a Glock 22 .40 caliber pistol, serial number PZL229, in violation of Title 18, United States Code, Section 922(o).

COUNT TEN: (18 U.S.C. § 922(k) – Possession of Firearms with an Obliterated Serial Number)

14. On or about July 31, 2018, in the Northern District of California, the defendant,

DANIEL JAMES,

knowingly possessed two firearms, specifically, two Anderson Manufacturing AM-15 5.56mm cal. pistols, that had been shipped and transported in interstate commerce, from which the manufacturer's serial number had been removed, altered, and obliterated, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

COUNT ELEVEN: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)

15. On or about July 31, 2018, in the Northern District of California, the defendant,

PAUL RIVERA,

having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, unlawfully and knowingly possessed a firearm, specifically, a Taurus PT709 Slim 9mm caliber pistol, serial number THW16062, in and affecting interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWELVE: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)

16. On or about October 9, 2018, in the Northern District of California, the defendant,

DARRYL WASHINGTON,

having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, unlawfully and knowingly possessed a firearm, specifically, a Bryco Arms Jennings 9mm pistol, serial number 1563705, in and affecting interstate commerce, in violation of Title 18, United States Code,

1 Section 922(g)(1).

2
3 COUNT THIRTEEN: (18 U.S.C. § 922(o) – Possession of a Machine Gun)

4 17. On or about January 10, 2019, in the Northern District of California, the defendant,
5 PAUL RIVERA,
6 unlawfully possessed and transferred a machinegun (any part designed and intended solely and
7 exclusively for use in converting a weapon into a weapon that shoots and is designed to shoot
8 automatically more than one shot, without manual reloading, by a single function of the trigger),
9 specifically, a device commonly known as a “Glock switch,” in violation of Title 18, United States
10 Code, Section 922(o).

11
12 COUNT FOURTEEN: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)

13 18. On or about January 10, 2019, in the Northern District of California, the defendant,
14 GEORGE MOORE JR.,
15 having previously been convicted of a crime punishable by a term of imprisonment exceeding one year,
16 unlawfully and knowingly possessed a firearm, specifically, a Mossberg 500A shotgun, serial number
17 K888504, in and affecting interstate commerce, in violation of Title 18, United States Code, Section
18 922(g)(1).

19
20 COUNT FIFTEEN: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to Distribute
21 Cocaine Base)

22 19. On or about January 29, 2018, in the Northern District of California, the defendant,
23 DANIEL JAMES,
24 knowingly and intentionally distributed and possessed with intent to distribute 28 grams or more of a
25 mixture or substance containing a detectable amount of cocaine base, in violation of Title 21, United
26 States Code, Sections 846, 841(a)(1) and 841(b)(1)(B)(iii).

27
28 //

1 COUNT SIXTEEN: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to
2 Distribute Cocaine)

3 20. On or about March 15, 2018, in the Northern District of California, the defendant,
4 DANIEL JAMES,
5 knowingly and intentionally distributed and possessed with intent to distribute a mixture or substance
6 containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers,
7 in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).
8

9 COUNT SEVENTEEN: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to
10 Distribute Cocaine Base)

11 21. On or about October 7, 2018, in the Northern District of California, the defendant,
12 DEANTAE KENNEDY-PALMER,
13 knowingly and intentionally distributed and possessed with intent to distribute a mixture or substance
14 containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Sections
15 846, 841(a)(1) and 841(b)(1)(C).
16

17 COUNT EIGHTEEN: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to
18 Distribute Cocaine Base)

19 22. On or about October 9, 2018, in the Northern District of California, the defendant,
20 DANIEL JAMES,
21 knowingly and intentionally distributed and possessed with intent to distribute 28 grams or more of a
22 mixture or substance containing a detectable amount of cocaine base, in violation of Title 21, United
23 States Code, Sections 846, 841(a)(1) and 841(b)(1)(B)(iii).
24

25 COUNT NINETEEN: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to
26 Distribute Cocaine)

27 23. On or about October 11, 2018, in the Northern District of California, the defendant,
28 DANIEL JAMES,

1 knowingly and intentionally distributed and possessed with intent to distribute a mixture or substance
 2 containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers,
 3 in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

4
 5 COUNT TWENTY: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to
 6 Distribute Cocaine Base)

7 24. On or about December 12, 2019, in the Northern District of California, the defendants,

8 DANIEL JAMES and
 9 PAUL RIVERA,

10 knowingly and intentionally distributed and possessed with intent to distribute a mixture or substance
 11 containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Sections
 12 841(a)(1) and 841(b)(1)(C).

13
 14 COUNT TWENTY-ONE: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to
 15 Distribute Cocaine Base)

16 25. On or about January 10, 2019, in the Northern District of California, the defendant,

17 DANIEL JAMES,

18 knowingly and intentionally possessed with intent to distribute a mixture or substance containing a
 19 detectable amount of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1) and
 20 841(b)(1)(C).

21
 22 COUNT TWENTY-TWO: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to
 23 Distribute Cocaine Base)

24 26. On or about January 10, 2019, in the Northern District of California, the defendant,

25 TERRY WALKER SR.,

26 knowingly and intentionally possessed with intent to distribute a mixture or substance containing
 27 cocaine base, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C).
 28

COUNT TWENTY-THREE: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to Distribute Cocaine Base)

27. On or about January 10, 2019, in the Northern District of California, the defendant,
STERLING WALKER,
knowingly and intentionally distributed and possessed with intent to distribute 28 grams or more of a
mixture or substance containing a detectable amount of cocaine base, in violation of Title 21, United
States Code, Sections 846, 841(a)(1) and 841(b)(1)(B)(iii).

FORFEITURE ALLEGATION: (18 U.S.C. § 924, 21 U.S.C. § 853, and 28 U.S.C. § 2461(c) –
Criminal Forfeiture)

1. The allegations contained above in this Indictment are realleged and by this reference
fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C.
§ 924 and 21 U.S.C. § 853.

2. Upon a conviction of any of the offenses alleged in Counts One and Three through
Fourteen above, the defendants,

DANIEL JAMES,
PAUL RIVERA,
DARRYL WASHINGTON,
STERLING WALKER,
DARRELL MURPHY JR.,
DESHAWN LEMONS-WOODARD,
GEORGE MOORE JR. and
VERNELL THROWER,

shall forfeit to the United States pursuant to 18 U.S.C. § 924(d)(1), any firearms and ammunition
involved in the commission of the offenses, including but not limited to the following property:

TKS Engineering AR15HD .223 cal. rifle, serial no. 0910010
Glock 23 40 cal. pistol with obliterated serial number
Glock 19 9mm pistol, serial no. TC928
Beretta 84FS Cheetah .380 cal. pistol, serial no. H07025Y
Smith & Wesson SD .40 cal. pistol, serial no. HFJ0152
Springfield Armory XD .40 caliber pistol, serial no. US4275

1	AR-15 style pistol, no manufacturer marks or serial number
2	Beretta 96 .40 cal. pistol, serial no. BER080602
3	AR-15 style pistol, no manufacturer marks or serial number
4	Fully automatic Glock 23 .40 cal. pistol, serial no. BAEA916
5	Fully automatic Glock 22 40 cal. pistol, serial no. PZL229
6	AR-15 style pistol, no manufacturer marks or serial number
7	Springfield Armory XD .45 caliber pistol, serial no. XD639243
8	Springfield Armory XD .40 cal. pistol, serial no. XD565385
9	Springfield Armory XD .45 cal. pistol, serial no. XD667617
10	AR-15 style pistol, no manufacturer marks or serial number
11	Short-barreled rifle, no manufacturer marks or serial number
12	Kahr Arms P40 .40 cal. pistol, with an obliterated serial number
13	Smith & Wesson 9mm pistol, serial no. FWS8802
14	Heckler & Koch USP40 .40 cal. pistol, serial no. 22-27117;
15	Beretta 92FS 9mm pistol, serial no. E38985Z
16	Smith & Wesson SD40 VE .40 cal. pistol, serial no. HFW2363
17	Taurus PT99AF 9mm pistol, serial no. TYK51102
18	Anderson Mfg AM-15 5.56mm cal. pistol, obliterated serial no.
19	Anderson Mfg AM-15 5.56mm cal. pistol, obliterated serial no.
20	Taurus PT709 Slim 9mm cal. pistol
21	Springfield Armory XD40 sub-compact .40 cal. pistol, serial no. US450601
22	Springfield Armory XD40 .40 cal. pistol, serial no. US387906
23	Smith & Wesson M&P .38 cal. pistol, serial no. 9076
24	Unknown mfr, serial no. unknown
25	Glock 30 .45 cal. pistol, serial no. CMT960US
26	Glock-type .40 cal. sub-compact pistol, equipped with Glock 27 slide assembly, serial no. FFF989
27	Bryco Arms Jennings Nine 9mm pistol, serial no. 1563705
28	Unknown manufacturer, AK-Type short barreled rifle
	Kimber 1911 Ultra Carry II .45 cal. pistol, serial no. KU234373
	Unknown make/model pistol with an "auto switch," seized on January 10, 2019
	Unknown make/model pistol, serial no. PF940C, seized on January 10, 2019
	Glock 30S, .45 caliber pistol, serial no. YEP619, seized on January 10, 2019
	Glock .45 caliber pistol with extended magazine, seized on January 10, 2019
	Davis Industries P380 pistol, serial no. AP068569, seized on January 10, 2019

Mossberg 500A shotgun, serial no. K888504, seized on January 10, 2019

Smith & Wesson 9mm handgun, serial no. FWF7388
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3. Upon a conviction of any of the offenses alleged in Count Two and Counts Fifteen through Twenty-Three, the defendants,

DANIEL JAMES.
GEORGE MOORE JR.,
DALE DAVIS.
TERRY WALKER SR.,
PAUL RIVERA.
DARRYL WASHINGTON.
CAMERON MOORE-WILLIAMS,
STERLING WALKER and
DEANTAE KENNEDY-PALMER,

shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), all right, title, and interest in property constituting and derived from any proceeds the defendants obtained, directly or indirectly, as a result of said violations, and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the said violations. Property to be forfeited includes but is not limited to a forfeiture money judgment and all United States currency and electronic devices, including mobile telephones, seized on or about January 10, 2019.

4. If, as a result of any act or omission of the defendants, any of said property

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property with cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property of the defendants pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 924.

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1 All pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853, 28 U.S.C. § 2461(c), and Federal Rule of
2 Criminal Procedure 32.2.

3
4 DATED: *Jan. 24, 2019*

A TRUE BILL.

Lincoln Jay
FOREPERSON

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8
9 DAVID L. ANDERSON
United States Attorney

10
11
12 STEPHANIE M. HINDS
Deputy Chief, Criminal Division

13
14 (Approved as to form: *Shiao Lee*)

Shiao Lee and Frank Riebli
Assistant United States Attorneys